

UNITED STATES DEPARTMENT OF THE INTERIOR
MINERALS MANAGEMENT SERVICE
GULF OF MEXICO OCS REGION

NTL No. 2005-G01

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NOTICE TO LESSEES AND OPERATORS OF FEDERAL OIL AND GAS
LEASES AND PIPELINE RIGHT-OF-WAY HOLDERS
ON THE OUTER CONTINENTAL SHELF, GULF OF MEXICO OCS REGION

Monitoring Bypassed Safety Devices

This Notice to Lessees and Operators (NTL) is issued pursuant to 30 CFR 250.103 to provide clarification and guidance for monitoring of bypassed production and pipeline safety devices.

Definitions

Terms used in this NTL have the following meanings:

Bypassed safety device means a safety device installed as part of the platform safety system and rendered inoperable by a person's action that prevents the safety device from performing its design function.

Computer-based technology system (CBTS) means a computer-controlled electronic safety system such as SCADA and remote terminal units (RTUs).

Control station means a location at which an operator is capable of monitoring and controlling the production process equipment and platform safety system.

Essential operating conditions means pressures, status of safety devices, liquid levels, temperature, and flow rates

and/or pressures on specific downstream components.

Non-computer-based system (NCBS) means a safety system that operates basically with pneumatic supply.

Remote site means a satellite or subordinate platform that is not connected to the parent facility.

Background

For production safety systems, 30 CFR.250.803(c) (1) allows the bypassing or blocking out of safety devices only if

1. The safety device is temporarily out of service for startup, maintenance, or testing;
2. The minimum number of safety devices is out of service at any one time;
3. Personnel monitor the bypassed or blocked out functions until the safety device is placed back in service; and
4. A designated visual indicator is used to identify the bypassed safety devices.

For pipeline safety systems, 30 CFR 250.1004(c) allows pipelines to continue operating when safety equipment has been rendered ineffective or removed from service only if

1. An equivalent degree of safety is provided; and
2. The safety equipment is identified by a sign placed on the equipment stating that the equipment has been rendered ineffective or removed from service.

This NTL addresses acceptable monitoring procedures during start up, maintenance, and testing for non-computer-based systems (NCBS) and monitoring procedures during maintenance and testing only for computer-based technology systems (CBTS). Monitoring procedures for bypassed electronic safety devices during startup operations are addressed in NTL No. 2002-G03, Supervisory Control and Data Acquisition (SCADA) Systems, effective March 20, 2002.

Monitoring Procedures for NCBS Bypassed Safety Devices

The acceptable procedures for monitoring NCBS bypassed safety devices are

1. Positioning monitoring personnel at either the control panel for the bypassed safety device, at the bypassed safety device, or at the component that the bypassed safety device would be monitoring when in service; and
2. Ensuring that monitoring personnel are able to view all relevant essential operating conditions until all bypassed safety devices are placed back in service and be able to initiate shut-in action in the event of an abnormal condition.

Monitoring Procedures for CBTS Bypassed Safety Devices

The acceptable procedures for monitoring CBTS bypassed safety devices at either a remote site or a parent facility are

1. Positioning monitoring personnel at a designated control station (until all bypassed safety devices are placed back in service) that is capable of
 - a. Displaying the status of the bypassed safety device and all relevant essential operating conditions that affect the bypassed safety device, well, pipeline, and process component;
 - b. Controlling the production process equipment and the entire safety system;
 - c. Displaying a visual indicator when safety devices are placed in the bypassed mode; and
 - d. Upon command, overriding the bypassed safety device and initiating shut-in action in the event of an abnormal condition; and
2. Maintaining communications at all times between remote monitoring personnel and the personnel performing maintenance or testing.

Paperwork Reduction Act of 1995 Statement

The collection of information referred to in this NTL provides clarification, description, or interpretation of requirements contained in 30 CFR 250 Subparts H and J. The Office of Management and Budget (OMB) approved the information collection requirements for Subparts H and J and assigned OMB control numbers 1010-0059 and 1010-0050, respectively. This NTL does not impose additional information collection requirements subject to the Paperwork Reduction Act of 1995.

Contacts

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